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Request for Information Regarding the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

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Request for Information Regarding the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

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General Comment

As a provider we are pleased to offer our comments on this proposed rule. Please consider our views on the issue of medical necessity as you move forward to promulgate the final rule.

Our interest is in assuring that "medical necessity" is determined through the application of objective and evidence-based clinical parameters that not only support appropriate admission but also provide for continuous access to mental health services as patients transition from one level of care to another.

Although we advocate for the delineation of medical necessity criteria, group health plans must also take into account the clinical judgement of expert physicians. These clinical parameters should assist in guiding patients to the appropriate level of care but should never be utilized as a replacement for sound clinical judgment.

Thank you.

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